

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE**

CROSSPOINT CHURCH,

Plaintiff,

v.

A. PENDER MAKIN, in her official capacity as  
Commissioner of the Maine Department of  
Education, and JEFFERSON ASHBY, EDWARD  
DAVID, JULIE ANN O'BRIEN, MARK  
WALKER, and THOMAS DOUGLAS, in their  
official capacities as Commissioners of the Maine  
Human Rights Commission.

Defendants.

Civil Action No. 23-cv-00146-JAW

**JOINT MOTION TO EXTEND DISCOVERY DEADLINES**

On March 27, 2023, Plaintiffs filed a complaint (Dkt. 1) and Motion for Preliminary Injunction (Dkt. 5) challenging the current statutory framework governing participation of religious schools in Maine's tuitioning program. This Court granted the parties' joint motions to amend the scheduling order on September 14, 2023 (Dkt. 33) and November 17, 2023 (Dkt. 35). Under the amended scheduling order, the deadline to make a written settlement demand, complete discovery, and other related deadlines are quickly approaching. They are as follows:

- Deadline to Make a Written Settlement Demand on Defendants: **January 16, 2024**
- Deadline to Complete Discovery: **January 30, 2024**

- Deadline to file Notice of Intent to file Motion for Summary Judgment and Need for a Pre-Filing Conference Pursuant to Local Rule 56(h): **February 6, 2024**
- Deadline for Filing of All Dispositive Motions and All Daubert and Kumho Motions Challenging Expert Witnesses with Supporting Memoranda: **February 20, 2024**
- Expected Trial Date: **May 7, 2024**

Plaintiff's Motion for Preliminary Injunction is still pending, and the Court's resolution of that motion will directly affect discovery and related proceedings in this case. It would thus promote interests of efficiency to extend these deadlines by an additional 60 days. This Court may extend a deadline "if a request is made[] before the original time or its extension expires." Fed. R. Civ. P. 6(b)(1)(A).

### **CONCLUSION**

The Court should grant this motion and extend all remaining deadlines listed in the amended scheduling order (Dkt. 35) by 60 days.

Dated: January 12, 2024

s/Christopher C. Taub  
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Respectfully submitted,

/s/ Patrick Strawbridge  
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**CERTIFICATE OF COMPLIANCE**

I certify that this motion complies with the length and typeface requirements of Local Rule 7(d).

Dated: January 12, 2024

/s/Christopher C. Taub  
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**CERTIFICATE OF SERVICE**

I certify that, on January 12, 2024, I electronically filed the foregoing with the Court and served it on opposing counsel through the Court's CM/ECF system.

Respectfully submitted,

/s/Christopher C. Taub  
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